

**BARCLAY DAMON** <sup>LLP</sup>

Edward G. Melvin II  
Partner

June 30, 2025

**VIA CM/ECF**

Hon. Miroslav Lovric  
United States Magistrate Judge  
United States District Court for the Northern District of New York  
Federal Building and United States Courthouse  
15 Henry Street  
Binghamton, New York 13901

Re: Theodore Barbuto v. Syracuse University and  
Mary Pat Grzymala  
5:23-CV-245 (AJB/ML)

Dear Judge Lovric:

As you are aware, our office represents the Defendants in the above-referenced matter.

On May 9, 2025, the Court ordered that dispositive motions shall be filed by July 14, 2025 (dkt. 44).

The parties have completed discovery pursuant to the Court's scheduling order. While Defendants have worked diligently to meet the July 14<sup>th</sup> dispositive motion deadline, Defendants respectfully request an extension of the dispositive motion deadline to August 14, 2025 in order to facilitate the preparation and filing of their motion for summary judgment, especially in light of the July 4 holiday and a two-day work function between now and July 14.

We have had an opportunity to discuss this request with Plaintiff's counsel, who has stipulated to the request.

Thank you for your consideration of this request.

Respectfully submitted,



Edward G. Melvin II  
Bar Roll No. 509037

cc: All Counsel of Record (via CM/ECF)